

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-40114-FDS

TIMOTHY L. LaFRENIER,

Plaintiff

v.

MARY ANNE KINIREY, DANIEL MORRISON,
The CHIEF OF POLICE "John Doe" and the
TOWN OF TOWNSEND,

Defendants

DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

Now come the defendants and hereby move, pursuant to Fed.R.Civ.P. 56(b), for summary judgment on all counts set forth in the Complaint.

As grounds therefor, defendants state that there exists no genuine issue as to any material fact, and that they are entitled to judgment in their favor as a matter of law. As further grounds therefor, defendants rely on the attached Local Rule 56.1 Statement of Material Facts of Record as to which There is No Genuine Issue to be Tried, and the attached memorandum of law.

WHEREFORE, the defendants respectfully request that this Court enter judgment in their favor, and dismiss the Complaint in its entirety.

DEFENDANTS,

MARY ANNE KINIREY, DANIEL
MORRISON AND TOWN OF
TOWNSEND,

By their attorneys,

/s/Joseph L. Tehan, Jr.
Joseph L. Tehan, Jr. (BBO# 494020)
Jackie Cowin (BBO# 655880)
Kopelman and Paige, P.C.
31 St. James Avenue
Boston, MA 02116
(617) 556-0007